

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

PETER TRAUERNICHT, et al.,

Plaintiffs,

v.

GENWORTH FINANCIAL, INC.,

Defendant.

CASE NO. 3:22-CV-00532

**DEFENDANT'S MOTION TO FILE MATERIAL UNDER SEAL**

Defendant Genworth Financial, Inc., pursuant to Federal Rule of Civil Procedure 26(c) and Local Civil Rule 5, respectfully moves this Court for an Order granting this Motion to File its unredacted Reply in Support of its Submission on Expert Report Matters. The motion is accompanied by a memorandum in support and a proposed order.

Dated: April 10, 2024.

Respectfully submitted,

**GENWORTH FINANCIAL, INC.**

By: /s/ Heidi E. Siegmund

Brian E. Pumphrey (VSB No. 47312)  
Heidi E. Siegmund (VSB No. 89569)  
MCGUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219-3916  
Telephone: (804) 775-7745  
Facsimile: (804) 698-2018  
bpumphrey@mcguirewoods.com  
hsiegmund@mcguirewoods.com

Eugene Scalia (VSB No. 36513)  
GIBSON, DUNN & CRUTCHER LLP

1050 Connecticut Avenue, NW  
Washington, DC 20036  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
Email: [escalia@gibsondunn.com](mailto:escalia@gibsondunn.com)

Karl G. Nelson (*pro hac vice*)  
2001 Ross Ave., Suite 2100  
Dallas, TX 75201-2923  
Telephone: (214) 698-3203  
Facsimile: (214) 571-2945  
Email: [knelson@gibsondunn.com](mailto:knelson@gibsondunn.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing using the CM/ECF system April 10, 2024, which will send an electronic notification of such filing to all counsel of record.

Respectfully submitted,

**GENWORTH FINANCIAL, INC.**

By: /s/ Heidi E. Siegmund

Brian E. Pumphrey (VSB No. 47312)  
Heidi E. Siegmund (VSB No. 89569)  
MC GUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219-3916  
Telephone: (804) 775-7745  
Facsimile: (804) 698-2018  
bpumphrey@mcguirewoods.com  
hsiegmund@mcguirewoods.com

Eugene Scalia (VSB No. 36513)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
Email: [escalia@gibsondunn.com](mailto:escalia@gibsondunn.com)

Karl G. Nelson (*pro hac vice*)  
2001 Ross Ave., Suite 2100  
Dallas, TX 75201-2923  
Telephone: (214) 698-3203  
Facsimile: (214) 571-2945  
Email: [knelson@gibsondunn.com](mailto:knelson@gibsondunn.com)

*Counsel for Defendant*